

EXHIBIT A

DECLARATION OF

MICHAEL J. HUI



3000 Hanover St, Palo Alto CA 94304

March 27, 2025

VIA U.S. MAIL AND ELECTRONIC MAIL (lizhongjie2010@gmail.com)

Proception.ai
Zhongjie “Jay” Li
REDACTED

Tesla, Inc.
Terry Ahearn
Managing Counsel
1.408.204.7384
tahearn@tesla.com

RE: Improper Access and Use of Highly Sensitive, Non-Public Tesla Information

Dear Mr. Li,

This letter serves as legal notice of claims against you and Proception as well as legal notice of breaches of your ongoing obligations to Tesla Inc. as your former employer. Please contact the undersigned to discuss resolution.

Tesla has evidence that after your reassignment from the Optimus Sensor Team to the Optimus AP Computer Team you continued to improperly access and download information—including to non-Tesla devices—that was unrelated to your assigned work. This Tesla information included, but is not limited to, hand and manipulation data, source code, confidential vendor information, and technical specifications, all containing highly sensitive and non-public information belonging to and concerning Tesla.

This access to Tesla information was unauthorized and improper at least because it directly concerns the Proception product which you began developing at Tesla, and which Proception now offers under a suspiciously short timeline.

Your actions breach Tesla’s confidentiality and security policies and your ongoing obligations to Tesla as a former employee and constitute violations of several laws. Given the gravity of the situation, we demand that you immediately take the following steps:

- **Locate, Secure, and Preserve:** Identify, secure, and preserve all Tesla-related information in Proception’s custody or control and suspend all document deletion or destruction protocols Proception has in place. Likewise, identify, secure, and preserve all Tesla-related information in your personal custody or control and do not delete any such information. This notice includes, but is not limited to, any Tesla-related information that you, or others, may have distributed internally or externally. This also includes all communications or exchange of information between any Proception personnel, including yourself, regarding any Tesla-related information;
- **Report Compliance:** Once the above steps have been executed, provide confirmation to the undersigned that all potentially relevant and responsive information has been securely segregated and preserved and provide to Tesla a copy of all such information. This process should be forensically sound and reviewed to prevent any



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further dissemination or misuse of Tesla's highly sensitive and non-public information and to ensure compliance across all Proception departments and personnel; and

- **Cease and Desist:** Cease and desist all attempts by you or Proception to unfairly compete with Tesla by seeking, using, or disclosing Tesla-related information, including, but not limited to, the Tesla-related information improperly and without authorization accessed or downloaded by you or improperly and without authorization received from you by any Proception personnel, or by any other person or third party.

We also remind you of your ongoing obligations concerning Tesla proprietary information. For example, pursuant to the Employee Non-Disclosure and Inventions Assignment Agreement that you signed and continue to be bound by (attached), you are, even now, required to hold Tesla proprietary information in strictest confidence. ¶ 1. This includes all the proprietary information you had access to during your employment with Tesla and includes the proprietary information you improperly and without authorization accessed. You are presently in breach of these obligations.

Even further, any and all inventions you developed using Tesla equipment, supplies, facilities, trade secrets, or proprietary information or that result from the work performed by you while at Tesla or that relate to Tesla's business **belong to Tesla. Id., ¶ 2.6.** As a result, Tesla may have an ownership interest in any product or technology developed by you while at Tesla, including the product being developed and offered by Proception. Resolution of the issues outlined in this letter will require resolution of Tesla's ownership rights in the product and technology being developed by Proception.

Please do not hesitate to reach out to me directly if you require further clarification or need assistance in this process (you can find my direct dial above). Your swift and thorough action in this matter is highly appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read "T3 Ah", likely representing Terry Ahearn.

Terry Ahearn